

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
                  v.                                ) Criminal No. 04-10179-RGS  
  )  
DEXTER BROWN                                 )

**JOINT INITIAL STATUS MEMORANDUM**

Pursuant to Local Rule 116.5(A), the parties hereby submit this Joint Memorandum to address issues relative to the progress of this case.

1. The parties do not seek relief from applicable timing requirements imposed by the local rule.
2. The parties do not seek discovery concerning any expert witnesses, pursuant to Fed. R. Crim. P. 16(a)(1)(E).
3. Although the government has provided to the defendant all documents and other discoverable materials in this case pursuant to automatic discovery, the government may receive additional discoverable information, which it will turn over to the defense. Additionally, the defendant does not presently have any discoverable information, but pursuant to their agreement to provide reciprocal discovery, will provide the government with any such information received in the future.
4. The defendant does not intend to file any dispositive motions in this case at this time. However, the defendant expects to file a motion for the disclosure of the grand jury minutes in this case, which the government has indicated it will oppose.
5. The parties, therefore, request an Order on Excludable Delay under the Speedy Trial Act.
6. There have been no discussions between the parties regarding the possibility of an early resolution of the case.

7. The parties request that an Interim Status Conference be schedule in this case.

Respectfully submitted,

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DEXTER BROWN,  
Defendant

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